

Crystal L. Cox
Pro Se Defendant
Case 2:12-cv-02040-GMN-PAL
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
Case 2:12-cv-02040-GMN-PAL**

Plaintiff Marc J. Randazza

**Motion to Disqualify, Remove, Recluse
Judge Gloria Navarro**

v.

**Defendant Crystal Cox AND
Defendant Eliot Bernstein**

I, Pro Se Litigant Crystal L. Cox have filed a Racketeering (RICO) Act Complaint with the District of Nevada. Judge Gloria Navarro is a named defendant in this case, now known as District of Nevada 2:13-cv-00297-JCM-NJK. In light of this new activity, I, Pro Se Defendant Crystal Cox am filing THIS Motion to Disqualify / Remove / Recluse Judge Gloria Navarro, though I have filed a similar motion before, this NEW information warrants a Reconsideration to REMOVE Judge Gloria Navarro from ruling over DISTRICT OF NEVADA, Case 2:12-cv-02040-GMN-PAL.

I, Pro Se Litigant Crystal L. Cox request that Judge Gloria Navarro be disqualified / removed / secluded from this case.

I, Defendant / Pro Se Litigant Crystal Cox, re-allege ALL stated in Prior Requests / Motions regarding Judge Gloria Navarro be disqualified / removed / secluded from this case. (Docket Entry 20 MOTION Requesting the Recusal, Removal of District Judge Gloria M. Navarro, Docket Entry 44 MOTION for Recusal of District Judge Gloria Navarro, Docket Entry 81 First MOTION to Disqualify Judge Gloria M. Navarro / Motion for Judicial Disqualification of Judge Gloria M. Navarro by Counter Claimant Crystal L. Cox, Defendant Crystal L Cox) Documents are Added to this Motion as Supplements for Reference of the Judicial Review Process / Decision making process.

The following will Be in My upcoming Complaint to the Ninth Circuit Judicial Review Board and in my Complaint to the Department of Justice and Attorney General in regard to how Judge Gloria Navarro has denied my rights of due process, denied my constitutional rights and favored a Las Vegas Attorney Plaintiff over a Pro Se Litigant. I am including this information here as part of my Request to Remove / Recluse / Disqualify Judge Gloria Navarro.

To: Ninth Circuit Judicial Review Board

**From: Pro Se Litigant
Complainant
District of Nevada Case 2:12-cv-02040-GMN-PAL
Investigative Blogger Crystal L. Cox**

**Regarding: Judge Gloria Navarro, Federal Judge
United States District Court
District of Nevada.**

Dear Judicial Review Board, and whom it may concern.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox, state the following upon my knowledge and belief, and can provide more documentation on any allegation, per request of the Special Investigator or Judicial Review Board.

Plaintiff in this Case is Marc J. Randazza, A Las Vegas Attorney who, I believe, is a licensed Attorney in Mass., California, Nevada, Florida, and Arizona. Plaintiff Marc Randazza is the Owner of Randazza Legal Group, a Law Firm in Florida, Arizona and Nevada.

Plaintiff, accused me of a Civil Conspiracy, Cybersquatting and other allegations. My Original Complaint answer to these allegations addressed the issue of conspiracy and denied all other allegations pertaining to Trademark infringement in domain names and blogs. Judge Gloria Navarro GRANTED Plaintiff a Motion to Strike my Complaint Answer and to Strike My Counterclaims. Judge Gloria Navarro forced me to file a new complaint answer or get a default judgement, which would be \$100,000 per domain name, and she even called free blogs domain name, (blogspot), therefore if I did not file an amended complaint to her specifications Plaintiff would be GRANTED a Default Judgement, which in this case would be over \$3 Million.

Judge Gloria Navarro GRANTED Plaintiff Marc Randazza a Preliminary Injunction in which caused me irreparable harm and did not preserve the status quo, and therefore is liable for the actions that have damaged me, Defendant / Pro Se Litigant / Complainant Crystal Cox.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox, believe that Judge Gloria Navarro discriminated against me, violated my rights of due process, violated my Constitutional Rights, and conspired with the Plaintiff in such way that has caused me irreparable harm, endangered me, ruined my business, defamed me, intimidated me and put me under massive duress.

The following written upon information and belief of Pro Se Litigant / Complainant Crystal Cox, respectfully of this court, in regard to unconstitutional, unlawful rulings against me, Pro Se Litigant / Complainant Crystal Cox by Judge Gloria Navarro who has repeatedly REFUSED to admit or deny conflict per a requested Conflict of Interest Disclosure.

An Examination of the Details of Document 14, dated, 12/14/2012 , ORDER Signed by Judge Gloria Navarro to Schedule a Hearing for a Motion for a Preliminary Injunction.

Document 14, dated, 12/14/2012 was an ORDER signed by Judge Gloria Navarro in which issued a hearing notice for a Preliminary Injunction. This order discussed Defendant Crystal Cox's date deadlines for her Response, and Plaintiff's date deadline for a Reply to that response. This Court Order, Docket Entry 14 set a hearing date for this matter to be January 7th, 2013.

Note that I, Pro Se Litigant Crystal Cox did not get Electronic Access to this case until January 3rd 2013. After Docket Entry 14.

This order was not a Granting of the Preliminary Injunction to seize my blogs and domain names and attempt to put a gag order on me, it was an **Order setting a hearing**. However the order also accused me of "bad faith", and what seems to be extortion, and offering reputation services after I asked Plaintiff for a job, which is not factual, and shows that Judge Gloria Navarro favored Plaintiff, as there was no proof that this happened, only the statement of the Plaintiff. I, Defendant Crystal Cox, provided "the Court" the actual eMail of my asking for a job, and no word had been posted on ANY of my blogs regarding Plaintiff at that time, there was no offering to "clean up" any "reputation" that I, Defendant Crystal Cox had cause for I had caused NONE. Judge Gloria Navarro simply defamed me in a court order and stated non-fact that was, upon my knowledge and belief, to aid and abet the Plaintiff in order to suppress my blogs, violate my First Amendment Rights, and retaliate against me.

There was no evidence whatsoever that I had a blog, or any written word in any way about or regarding to Plaintiff before I emailed him and asked for a job, because I, Defendant Crystal Cox, never had such a blog or published word. Yet Judge Gloria Navarro simply took the Plaintiff Marc Randazza's stated word and defamed me in court orders and caused me irreparable harm to me in a Preliminary Injunction, without merit, without Trademark Law actually applying and without the Adjudication of my First Amendment Rights at Issue.

Docket Entry 14, Signed by Judge Gloria Navarro Clearly shows that there was **no Hearing yet** on the matter of the Preliminary Injunction, and this ORDER clearly shows future dates of Responses by Defendant and Reply by Plaintiff, "IT IS FURTHER ORDERED that Defendants shall have until Friday, December 28th, 2012, to file their Response Brief to Plaintiffs' "Motion for Preliminary Injunction (ECF No. 2). Thereafter, Plaintiff shall have until Friday, January 4, 2012, to file their Reply Brief. **The matter shall be set for a hearing** on Plaintiff's Motion for a Preliminary Injunction on Monday, January 7th, 2013, at 3:00 PM." Signed by Judge Gloria Navarro.

This suggests that there has been no decisions made, and **clearly recognizes that Defendants have a right to Respond** to the "Motion for Preliminary Injunction (ECF No. 2) and that Defendant has not yet done so, then Plaintiff, as this ORDER Clarifies, Plaintiff has a right to Reply to Defendant's Response. Yet this ORDER actually was used to SEIZE all domain names and blogs from Defendant Crystal Cox and Defendant Eliot Bernstein as if it was an ORDER To So. There is confusing information in the ORDER regarding the Seizing of the Domain Names and Blogs, yet at the end it clearly states that there will be a Response Brief, a Reply Brief, and a Hearing BEFORE this Decision is made, ruled upon.

This ORDER actually seemed to give Plaintiff some sort of power to seize massive domain names, and orders that these domain names be locked. Docket Entry 14, Signed by Judge Gloria Navarro page 11, at the bottom says the following, after listing massive amounts of blogs and domain names owned, authored by Defendant Crystal Cox and domain names owned by Defendant Eliot Bernstein, "... shall be immediately locked by Registrar and/or its successor registrar and transferred to Plaintiffs".

First of all Judge Gloria Navarro has no lawful or constitutional right to order these domain names be transferred to Plaintiff BEFORE a Response is allowed by Defendant and BEFORE a hearing on the matter, which this ORDER clearly schedules.

Secondly this ORDER, Docket Entry 14, Signed by Judge Gloria Navarro, says that "... shall be immediately locked by Registrar and/or its successor registrar and transferred to Plaintiffs", this means that Godaddy SHOULD have "Locked" the domain names before transferring and that the domain names shall remain locked for the remainder of the proceeding. Yet, to the damage of Defendant Crystal Cox and Defendant Eliot Bernstein, Godaddy Inc., unlocked the Domain Names and Transferred the Domain Names to the Plaintiff, this enabled the Plaintiff to change the Servers, and to redirect ALL the intellectual property, blog posts, domain names to ONE Blog post on the Blog of the Plaintiff, the Legal Satyricon. A blog post in which defamed Defendant Crystal Cox and linked to other articles intentionally defaming and flat out lying about Defendant Crystal Cox.

Defendant Crystal Cox's work, intellectual property, online media, thereafter linked to a page that spoke negative of Crystal Cox, defamed me and deterred my clients, lost me business, damaged my reputation, caused me to be threatened and under constant duress and ALL without any kind of Due Process or Constitutional rights adjudicated by "this court", aKa, Judge Gloria Navarro.

In most cases where the Constitutional rights of the Defendants are of concern, and due process is allowed, a Judge would order the Registrar to simply lock the domain names to prevent transfer while the legal dispute is going on, District of Nevada Judge Gloria Navarro has treated this differently then UDRP Rules, WIPO, or other courts I have experience with, and to the advantage of the Plaintiff, Las Vegas Attorney Marc J. Randazza, and to the detriment and irreparable damage of Defendant Crystal Cox and Defendant Eliot Bernstein.

Godaddy simply gave the Plaintiff the Domain Names, without locking the Domain Names and the servers were changed, this enabled Plaintiff to wipe out massive amounts on blog content, online content, remove links, remove domain names and blogs from the search engines. When I, Defendant Crystal Cox complained to Godaddy, they emailed me a letter send to them from Plaintiff Marc Randazza's Attorney, Ronald D. Green of Randazza Legal Group. The letter directed Godaddy what to do and used Docket Entry 14, ORDER Signed by Judge Gloria Navarro as Plaintiff's right to have domain names transferred. However, this does shift liability of the matter from Godaddy to Randazza Legal Group's Ron Green, yet it does not explain why the domain names were NOT locked and the servers were allowed to be changed BEFORE due process, before Defendant's RESPONSE was heard, and BEFORE the hearing in which this ORDER is clearly setting.

After this Order, Docket Entry 14, Signed by Judge Gloria Navarro, was sent by Plaintiff Marc Randazza's Attorney, Ronald D. Green of Randazza Legal Group to Godaddy, the domain names were GIVEN to Plaintiff, the Servers were changed and this removed massive online content, links, search engine ranking and damaged the online media and intellectual property of Defendant Crystal Cox and Defendant Eliot Bernstein.

This damage is irreparable, and cannot be undone, yet was done so BEFORE a hearing regarding the "Motion for Preliminary Injunction (ECF No. 2), which by the way was filed the SAME DAY, as the Original Complaint filed by Randazza Legal Group's Ronald D. Green, on behalf of Plaintiff Marc Randazza.

Upon my Knowledge and Belief, the plan (conspiracy) was to file a lawsuit against Defendant Crystal Cox and Defendant Eliot Bernstein, then that same day file a "Motion for Preliminary Injunction", get "their judge", whom I believe acted in Criminal and Civil conspiracy with Plaintiff and the Randazza Legal Group, to simply grant a Preliminary Injunction, and seize the blogs and domain names that upset Plaintiff, that he wanted to wipe out and the online statements and media that Plaintiff Marc Randazza did not agree with or approve of. There was no Jury Demand, and this was all to be done without the due process or rights of Defendant Crystal Cox and Defendant Eliot Bernstein to even be considered. Plaintiff Marc Randazza's Attorney, Ronald D. Green of Randazza Legal Group had not even attempted to notify, email, call, or serve Defendant Crystal Cox and Defendant Eliot Bernstein, even though they clearly had Defendant Crystal Cox's email, as I was a former client of Plaintiff Marc Randazza. I, Defendant Crystal Cox, found out about the lawsuit from blogs defaming me, and talking negative about my "actions", when really it was simply accusations of "actions" that were in a Lawsuit / Complaint filed against me in the District of Nevada of which I was purposely not made aware of. , Defendant Crystal Cox, contacted the court and had myself served so that I could answer the Complaint and the "Motion for Preliminary Injunction".

Upon my Knowledge and Belief, Plaintiff Marc Randazza's Attorney, Ronald D. Green of Randazza Legal Group never planned to serve the Defendants, but only planned to SEIZE the domain names, blogs, online media of Defendant Crystal Cox, all without me even knowing that the lawsuit existed. Plaintiff Marc Randazza had filed a WIPO complaint the months prior, and knew full well that I was living in Washington State, yet the Complaint listed me as in Montana, this was to further insure that he get a Preliminary Injunction and be able to delete blogs and change online content, BEFORE I responded to the lawsuit, he did not expect me to contact the court and have myself served.

Plaintiff Marc Randazza's Attorney, Ronald D. Green of Randazza Legal Group filed this complaint on November 28th, 2012, than bloggers, attorneys, online media "friends" of Randazza Legal Group and Plaintiff Marc Randazza, used this complaint to disgrace, humiliate, and defame Defendant Crystal Cox and Defendant Eliot Bernstein. The complaint was published, broadcast widely online, as was the WIPO decision in connection with the same non-factual allegations. That same day they filed for an Injunction to simply STEAL my blogs, domain names and forcefully SUPPRESS our First Amendment Rights.

Order, Docket Entry 14, Signed by Judge Gloria Navarro, **Footnote on Page 6 of 12 Says**, "First, the Court doubts that Defendants have acted with the requisite "good faith" This is a violation of my rights. As "this court" had performed no investigation into this matter of whether I, Defendant Crystal Cox nor Defendant Eliot Bernstein acted in Good Faith. Judge Gloria Navarro simply took Plaintiff's word as fact and violated the rights of Defendant Crystal Cox nor Defendant Eliot Bernstein.

Judge Gloria Navarro performed No First Amendment adjudication of the named domain names or blogs, and simply took Plaintiff's stated word as fact. And caused irreparable damage to Defendant.

In this same footnote on Page 6 of 12, Judge Gloria Navarro defames Defendant Crystal Cox in discussion of authorship and domains, and me having no rights to works of authorship, this is not fact.

Also in this same footnote on Page 6 of 12, Judge Gloria Navarro further defames Defendant Crystal Cox and thereby lumps in Defendant Eliot Bernstein who had nothing to do with the domain name MarcRandazza.me. Judge Gloria Navarro discusses a domain name that I offered for sale for 5 Million and that I only offered the domain name and not my "lawful exploitation of work", I assume this to say that Judge Gloria Navarro says I offered a domain name for 5 Million Dollars for sale, and did not offer the blog or words attached to the domain name and therefore I did not act in "good faith" according to "this court" which in this ruling is Judge Gloria Navarro. However, First of All, I did not Offer MarcRandazza.me to Plaintiff for any price whatsoever. I posted a Joke on my blog, with the title here Kitty Kitty, making fun of the domain name MarcRandazza.me and the WIPO complaints and the massive spectacle Marc Randazza was making over domain names that he had not bought himself as a domain name expert (MarcRandazza.com) and making fun of a First Amendment Attorney trying to FORCEFULLY take away my First Amendment Rights. I made a joke of Selling it for \$5 Million, however, I, Defendant Crystal Cox, have every right to sell any domain name for any price I want to, yet Judge Gloria Navarro makes this seem unlawful somehow and uses this as yet another reason to say I acted in "bad faith".

SECONDLY MarcRandazza.me never, EVER had any content, any "exploitation of work". MarcRandazza.me was parked at Godaddy as the register shows and Godaddy placed ads on the domain name MarcRandazza.me. I, Defendant Crystal Cox never published anything on that domain name, yet Upon my Knowledge and Belief, Judge Gloria Navarro has the power to state this as fact, just because she favors the Plaintiff and takes his word over mine.

Plaintiff Marc Randazza acted in “bad faith” in filing an 840 Trademark Lawsuit against Investigative Blogger Crystal Cox just because he does not like me, does not agree with me and wants my domain name names and online content. Plaintiff Marc Randazza acted in “bad faith” filing a Trademark Lawsuit and a WIPO complaint knowing full well that he had no Trademark, and therefore, as a Trademark Attorney himself, knowing he had not trademark, Plaintiff Marc Randazza is the one that acted in bad faith.

Yet, Judge Gloria Navarro, with no proof, and only the word of Plaintiff Marc Randazza, ruined my life, ruined my hard work and assets, violated my rights, incited hate against me, defamed me and harmed me and my business irreparably. Just because Gloria M. Navarro is a Federal Judge, that does not give Judge Gloria Navarro the legal and constitutional right to RUIN my LIFE just because a Las Vegas Attorney does not like me, and she favors him and his rights over mine, regardless of the proof, the law and the constitutional rights of the defendant.

Plaintiff Marc Randazza should not have special rights and privileges because he is an Attorney. Plaintiff Marc Randazza should not have greater First Amendment rights than those he sues.

Keep in mind that Judge Gloria Navarro has ruled this way for this Plaintiff and Attorney before, in order to help their clients seize intellectual property BEFORE the First Amendment Adjudication process of the issue at hand, such as the ViaView case. Judge Gloria Navarro stated in Randazza v. Cox and in other cases in favor of this same Law firm that there is a “Likelihood of Success of Merits”. Judge Gloria Navarro SHOULD be investigated for her repeat actions for this same Attorney, especially actions that are “extraordinary”.

Judge Gloria Navarro ruled that Plaintiff had a “Likelihood of Success of Merits” on six causes of action, yet Plaintiff had no Trademark, no proof of this “Likelihood of Success of Merits”, and yet, Judge Gloria Navarro used this to defame Defendant Crystal Cox in this ORDER scheduling a hearing and later in the actual **GRANTING of the Preliminary injunction**, keep in mind that as of this hearing scheduling, my Domain Names were seized, blogs deleted, online content removed, and NOT after the GRANTING of the “Motion for Preliminary Injunction”. This is a violation of my rights, and to prevent this from happening to future victims of Randazza Legal Group, in what looks to be criminal and civil conspiracy with Judge Gloria Navarro, I request this court, investigate this serious situation. As this is not just about some free blogs, or a few domain names, nor is it about the intellectual property and duress of one person, Defendant Crystal Cox. I believe they have done this before and there is HUGE money at stake. Judge Gloria Navarro has frozen accounts to make sure that Randazza Legal Group gets paid, such as in the Righthaven cases, she has given Preliminary Injunctions before in this same manner such as the ViaView case and probably others. I want to protect future victims of what looks to be an ongoing scheme.

On top of that Plaintiff asks for \$100,000 for each domain name, each blog that he states is infringing on a Trademark that he does not have. For this case that is around 3 Million Plus they are asking for around \$10,000 a month in Attorney Fees. This is a serious Racketeering Business, the way I see it and I want to protect future victims by having Randazza Legal Group and Judge Gloria Navarro Investigated by the Attorney General, the Department of Justice and the Ninth Circuit Judicial Review Board.

Regarding Ruling, Docket Entry 14, Judge Gloria Navarro **did not give me an opportunity to be available by phone for this hearing**, and therefore discriminated against my rights. At this January 7th, 2013 hearing, Judge Gloria Navarro ruled to Grant the Preliminary Injunction, by this time, I, Defendant Crystal Cox had filed my objection and was not heard, nor given my constitutional right of First Amendment Adjudication. The domain names had already been redirected, damage to my online media already done, damage to my life and career already done, blogs deleted and Plaintiff used the ORDER for the hearing scheduling as a way to Publicly Disgrace me in blog posts titled SEIZED from Crystal Cox. Other bloggers such as Tracy Coenan did the same thing. All without my rights of due process or constitutional rights being a factor or even a consideration.

Also At this January 7th, 2013 hearing, Judge Gloria Navarro ruled that, Defendant Crystal Cox's Motion for Judges and Clerks to Sign a Conflict of Interest Disclosure was DENIED; Defendant Crystal Cox's Motion Requesting the Recusal, Removal of District Judge was DENIED; Plaintiff's Motion for Preliminary Injunction is GRANTED. "Mr. Green shall file a proposed order consistent with the Court's ruling."

Upon my Knowledge and Belief, Injunctive Relief in this case was unconstitutional and has caused me, Defendant Crystal Cox irreparable harm. Judge Gloria Navarro has blocked my right to due process in order to favor Plaintiff Marc J. Randazza, a Las Vegas Attorney. The First Amendment of The Constitution of the United States should not apply to Plaintiff Marc Randazza and NOT Defendant Crystal Cox nor Defendant Eliot Bernstein.

Upon my Knowledge and Belief, Judge Gloria Navarro ruled outside of the law and outside of the constitutional rights of Defendant Crystal Cox and Defendant Eliot Bernstein

Plaintiff, Marc Randazza, admittedly has no Trademark. Even if he did, the First Amendment Trumps Trademark in the case of all these blogs and domain names that Defendant Crystal Cox was using to parody Plaintiff, make fun of Plaintiff, criticize Plaintiff, report on Plaintiff, review Plaintiff and his Law Firm, and exercise her First Amendment Rights.

There are massive amounts of cases that support Crystal Cox's Defense in all these issues at stake, many such documents were by the Plaintiff himself, yet he acts hypocritical in this case Randazza V. Cox and Judge Gloria Navarro seems to aid and abet his actions, as to my knowledge and belief of the situation.

Document 75 of District of Nevada Case 2:12-cv-02040-GMN-PAL, Motion for Summary Judgement Filed by Plaintiff's Attorney Ronald D. Green Jr. of Randazza Legal Group, against Defendant Crystal Cox, filed on 2-12-2013, page 14 line 16 through 17, says, **"While Plaintiff Randazza does not possess a registered trademark in his personal name, "MARC J. RANDAZZA"**, proving Plaintiff knew all along he had no Trademark, yet committed fraud on the courts, fraud on WIPO, wasted the court's time and money, and ruined the life, quality of life and business of his intended target, Defendant Crystal Cox.

Judge Gloria Navarro on page 4 of 12 of Document 14, dated, 12/14/2012 at the bottom Says. **"Injunctive relief [is] an extraordinary remedy** that may only be awarded upon clear showing that plaintiff is entitled to such relief" .. "Above all, a temporary restraining order "should be restricted to serving [its] underlying purpose of preserving status quo and preventing irreparable harm .."

Yet in Randazza vs. Cox, There was no clear showing that Plaintiff would Prevail or was Entitled to this relief. There was no Jury Demand, so the only deciding factor to my fate was Judge Gloria Navarro. This Preliminary Injunction did NOT preserve the Status Quo, instead it deleted massive content, removed blogs, changed servers, redirected link and all my work redirected to a blog post on Opposing Counsel's blog attack me, defaming me and inciting hate against me. Judge Gloria Navarro did in FACT cause massive irreparable harm to Defendant Crystal Cox and Defendant Eliot Bernstein and seems to have no accountability, therefore I am asking for an investigation into these rulings, these matters, these actions directly favoring this Plaintiff, this Law Firm.

Judge Gloria Navarro, District of Nevada, provides this "extraordinary" remedy to this Plaintiff again and again, and to the detriment and irreparable harm of the Defendants. I, Pro Se Litigant Crystal Cox ask for this to be investigated.

Document 14, dated, 12/14/2012 was an ORDER signed by Judge Gloria Navarro in which issued a hearing notice for a Preliminary Injunction. Yet this document was used as an ORDER Granting a Preliminary Injunction and Violated the Rights of Defendant Crystal Cox and Defendant Eliot Bernstein.

Upon my Knowledge and Belief, Judge Gloria Navarro simply took the Plaintiff Marc Randazza's stated word and this was used against me, Defendant Crystal Cox and Defendant Eliot Bernstein, in violation of our Constitutional Rights and without Due Process of Law afforded to me or to Defendant Eliot Bernstein. This should not be tolerated in a court of the United States, I OBJECT to the violation of due process and violation of my constitutional rights in ORDER Entry 14 of District of Nevada Case 2:12-cv-02040-GMN-PAL. And I ask that Judge Gloria Navarro be investigated for her actions, in hopes of saving innocent victims of this scheme in the future and of warning the Public at Large.

**An Examination of the Details of Docket Entry 41, Judge Gloria M. Navarro Ruling
Granting Preliminary Injunction to Plaintiff.**

I, Defendant / Pro Se Litigant / Complainant Crystal Cox, Re-Allege all of the preceding paragraphs.

In **Docket Entry 41, ORDER**, Judge Gloria Navarro GRANTED a Preliminary Injunction, however, the Domain Names and blogs had already been SEIZED before, I Pro Se Defendant Crystal Cox had a chance to respond to any of the allegations, as noted in the Order of Document 14.

It is not “standard of practice” to direct a domain name registrar to transfer domain names that have not had a fair trial, or due process. The domain names in dispute are generally, locked as they are, to preserve status quo and are not turned over to the Plaintiff, the demanding party simply because they said so. It is my belief that Judge Gloria Navarro has acted outside of the law in order to aid and abet the ‘agenda’ of Las Vegas Attorney, Plaintiff, Marc Randazza.

The Plaintiff was NOT lawfully, constitutional entitled to a Preliminary Injunction, as per the preceding reasons stated by Defendant / Pro Se Litigant / Complainant Crystal Cox, yet Judge Gloria Navarro GRANTED Plaintiff a Preliminary Injunction, in which did in FACT cause irreparable harm and destroy any chance of “status quo”.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox, did NOT use the Domain Names commercially, Plaintiff never proved that I did, yet Judge Gloria Navarro claims I have no right to register a domain with a person’s name in it and simply grants Preliminary Injunction. I Provided this court, Judge Gloria Navarro with information proving the opposite defense, even cases such as GlenBeckRapedandMurderedAYoungGirlIn1990.com, a case in which Plaintiff Marc Randazza Defended the Domain Name owner of that name and his right to own that Domain Name, and he won. I gave Judge Gloria Navarro supporting documentation and evidence and my rights were blocked, denied, and my intellectual property destroyed, reputation irreparably harmed, and my quality of life severely damaged.

In **Docket Entry 41, ORDER**, Judge Gloria Navarro discusses that Page 7, Line 24, “Given the fact that the **Defendant has been shown to have engaged in a pattern of cybersquatting and cyber-extortion**, this Court finds that she was more likely than not, attempting to sell this domain name to the plaintiff, or to solicit a price for the domain names in excess of her out of pocket expenses related to the domain name.”

Judge Gloria Navarro has no right to RULE on matters of other alleged victims, patterns of cybersquatting, cyber-extortion and domain name solicitations which are no part of this case, are not material facts of this case and are simply something that the Plaintiff ALLEGED that I, Defendant Crystal Cox, did, in which I am not guilty of nor have I had due process of law on those allegations. Upon my knowledge and belief Judge Gloria Navarro has used this motion to further defame me, make me look like a criminal, and ruin my life and business, knowing full well that Plaintiff and Co-Conspirators will see this document, and that it will affect my future business and reputation. All without my due process of law.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox have not engaged in a pattern of cybersquatting and cyber-extortion nor been convicted of such. I have NEVER done this, nor been given a trial or due process on this ACCUSATION. Yet Judge Gloria Navarro flat out says I am guilty of this “**pattern**”, which is criminal, based on the LIE of Opposing Counsel, the Plaintiff who himself is an attorney, and DOES know the domain name business.

Judge Gloria Navarro does not have an understanding of Domain Names, and should have sought outside expertise, instead of simply taking the Plaintiff's word on the issue. Judge Gloria Navarro says, “ **this Court finds that she was more likely than not, attempting to sell this domain name to the plaintiff, or to solicit a price for the domain names in excess of her out of pocket expenses related to the domain name**” First of all Domainers do this every hour of every day, of every week and have for decades. I have been to trade shows and followed the domain name business for over a decade. I have every legal right to buy a domain name for \$10 or 10 Million Dollars and re-sell that domain name for whatever price I want to. That is done everyday in the domain name market and has nothing to do with out of pocket expense. Domain Names are the Real Estate of the Internet. For Judge Gloria Navarro to use this as a reason to cause me irreparable harm, is unlawful and unconstitutional.

Judge Gloria Navarro seems to be saying that she is just going to GIVE the Plaintiff the domain names he wants, to prevent me from selling them to him or anyone else, that is unlawful and unconstitutional.

Judge Gloria Navarro claims on page 7 that I offered to sell MarcRandazza.me to Plaintiff for 5 Million Dollars, that is NOT True, I made a joke on my blog to the public and NOT to the Plaintiff. The Plaintiff offered to buy MarcRandazza.com from me at one point and, as the record shows I said it was not for sale at ANY price. Judge Gloria Navarro is defaming me in this ORDER and accusing me of things I have not DONE nor been given due process of law on those allegations. Judge Gloria Navarro has no right to ruin me, defame me, harass me based on the word of ONE MAN, the Plaintiff.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox did not buy MarcRandazza.me with intend to profit from reputation services, that is a flat out falsehood, and just because it comes from a judge does not make it TRUE or Lawful. This is a violation of my rights.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox have every right to ask for Judge Gloria Navarro to be removed from my case yet in this ORDER she AGAIN rules that I have no right to ask her to sign a Conflict of Interest Request and no right to have her removed from my case. This is unlawful and unconstitutional.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox ask for there to be a full investigation as to the lawful right of all domain names in this case, including the domain names in the WIPO dispute be investigated as this is an issue of massive public concern when Plaintiff wishes \$100,000 per domain and per blog, and has District of Nevada judges rule on matters to pay these attorneys after they violate the defendants rights.

I OBJECT to the violation of due process and violation of my constitutional rights in ORDER Entry 41 of District of Nevada Case 2:12-cv-02040-GMN-PAL. And I ask that Judge Gloria Navarro be investigated for her actions, in hopes of saving innocent victims of this scheme in the future and of warning the Public at Large.

Pro Se Defendant in this case, Crystal Cox filed several requests for Judge Gloria Navarro to sign a Conflict of Interest Disclosure, assuring Pro Se Defendant that she had no conflicts or financial connection with the Plaintiff, Marc Randazza, his Law Firm Randazza Legal Group, Ronald D. Green his acting Attorney formerly of Greenberg Traurig,

I, Defendant / Pro Se Litigant / Complainant Crystal Cox am an investigative blogger and I get tips on important issues related to the Plaintiff. I filed a motion to investigate, bringing to the attention of Judge Gloria Navarro matters of serious public concern and asked for her to notify authorities on this matters, Judge Gloria Navarro DENIED this motion, struck it from the record, and though it is the lawful duty of Judge Gloria Navarro to notify the proper authorities on suspected criminal activity, she refuses this obligation, duty even at the request of a Pro Se Litigant who fully believes that peoples lives and livelihoods are in danger.

An Examination of the Details of Docket Entry 89, Judge Gloria M. Navarro Ruling Granting Plaintiff's Motion to Strike Pro Se Defendant Crystal Cox's Complaint Answer.

Docket Entry 48 was in part a Motion to Strike Defendant Crystal Cox's Answer to the Complaint. I, Pro Se Litigant Crystal Cox had mailed my complaint answer in to the courts and it was put on the Docket on January 3rd, 2013. Docket Entry 23. **Docket Entry 89**, is a Motion Signed by Judge Gloria Navarro Granting Plaintiff's Motion to STRIKE My Complaint Answer.

Judge Gloria Navarro ORDERED that I, Pro Se Litigant Crystal Cox file an Amended Answer, and that I stick to the allegations, the causes that Plaintiff has alleged. This tied my hands as to a defense in many ways, as the Plaintiff accused me of Civil Conspiracy, and my response addressing those issues in detail, and objecting to the Trademark issues as Plaintiff DOES not Have a Trademark.

In Document 89, COURT Order Signed by Judge Gloria Navarro, Page 4 Line 13 to 17, Judge Gloria Navarro Says, ""Specifically, when answering a complaint, defendants must (1) "state in short and plain terms its defenses to each claim asserted against it"; and (2) "admit or deny the allegations asserted against it by an opposing party." Fed. R. Civ. P. 8(b)(1)." AND

"In this case, Defendant's answer merely states that she denies "all counts of Complaint." (Answer, ECF No. 23.) Defendant fails to actually address the claims asserted in the Plaintiffs' Complaint."

I, Pro Se Litigant Crystal Cox did deny all claims, as Judge Gloria M. Navarro admits here, in saying that Defendant's answer denies "all counts of the Complaint". I Pro Se Defendant did DENY all Claims of the Complaint. And therefore did "actually address" the claims. And as for Claim number 6, Civil Conspiracy, I addressed this Claim in detail best I could as a Pro Se Litigant.

Document 89, line 15-17 Judge Gloria Navarro Says, "Instead, the statements in Defendant's Answer relate to accusations of conspiracies against her. Furthermore, these other issues are not relevant to the allegations of cybersquatting and related allegations that are included in Plaintiffs' Complaint."

It is my Opinion and belief that in this statement Judge Gloria Navarro shows her deliberate attempt to sabotage me, Pro Se Litigant Crystal Cox, to BLOCK my rights of due process, silence me, tie my hands, violate my constitutional rights and take away my rights of due process.

Judge Gloria Navarro has erred in saying "Furthermore, these other issues are not relevant to the allegations of cybersquatting and related allegations that are included in Plaintiffs' Complaint". I, Pro Se Litigant Crystal Cox did not engage in cybersquatting, I denied this allegation, for I did not violate this law.

My complaint answer CERTAINLY did address the allegation in the complaint and the reason as to why the Plaintiff filed the harassing SLAPP suit against me, and I thoroughly addressed Cause Six, which is an "allegation" of civil conspiracy. My complaint answer should not have been stricken and I should not have been forced by court order to only answer cybersquatting and other allegations not related to "conspiracy" as I was being ACCUSED of conspiracy by Plaintiff in the Complaint.

My Complaint answer was changed under duress and threat of a Default Judgement, which would be over 3 Million Dollars and further RUIN my Life.

Judge Gloria Navarro SAID, "Instead, the statements in Defendant's Answer relate to accusations of conspiracies against her"

Judge Gloria Navarro as acted outside of the law in stating this, and she has ERRED, in my opinion, flat out lied to defend, favor, stand up for her Co-Conspirator Plaintiff Marc Randazza.

I, Pro Se Litigant Crystal Cox / Pro Se Defendant was accused of "Conspiracy" as Cause of Action SIX clearly states, my Complaint Answer is Denied and I am told to amend the complaint and not to "relate to accusations of conspiracies", even though I was ACCUSED of Conspiracy. This is unlawful, a violation of my rights and unconstitutional.

I, Pro Se Litigant Crystal Cox ask for an investigation into this case and all cases connected to Randazza Legal Group, Ronald D. Green Formerly of Greenberg Traurig, J. Malcom Devoy of Randazza Legal Group and Marc J. Randazza owner of Randazza Legal Group.

Judge Gloria Navarro pressured me to answer the complaint the way she wanted it answered and to NOT address the alleged "conspiracy", this is unconstitutional. Judge Gloria Navarro pressured me by threat of, if I did not amend my complaint and under her guidelines I would get a Default Judgement, this is unconstitutional.

Judge Gloria Navarro BLOCKED my true answer and pushed me to answer in a specific way outside of the "conspiracy" by ruling in a court ORDER, that I DO NOT "Answer relate to accusations of conspiracies against her" Another words, at the court ORDER of Judge Gloria Navarro, I, Pro Se Litigant Crystal Cox am not to address the conspiracy against me in my defense of Cause of Action Six, accusing me of Civil Conspiracy.

Judge Gloria Navarro accuses my complaint answer of being improper, as per the body of page 4, if I do not stick to allegations of "cybersquatting" when clearly I was ACCUSED of CIVIL CONSPIRACY as well.

On page 5 Judge Gloria Navarro says that In filing an amendment to my Counterclaim I used up my one pleading, "Rule 15(a)", "a party may amend its pleading once as a matter of course" Judge Gloria Navarro says I exhausted this opportunity when I filed an amended Counterclaim.

I, Pro Se Litigant Crystal Cox believe that Judge Gloria Navarro deliberately erred in this ruling as I did not exhaust my "opportunity" at amending my complaint answer by amending a counterclaim, they are to VERY different motions, filings, documents. Judge Gloria Navarro goes on to say that to file an amended complaint answer I, Pro Se Litigant Crystal Cox need permission from the Plaintiff or a court ORDER, yet I never asked to amend the complaint answer.

And even if this is true, Judge Gloria Navarro struck my countercomplaint in this case, so don't I get another "opportunity" at amending SOMETHING?

I, Pro Se Litigant Crystal Cox did file my amended complaint answer and removed all that may incriminate Plaintiff or Judge Gloria Navarro to the best of my ability, I did this under duress as the ORDER says if I did not do as the ORDER ruled, I would be subject to a Default Judgement, and at this point in time that would be \$3 Million Dollars and approx. \$35,000 in attorney fees to the Plaintiff.

Upon my knowledge and belief, Judge Gloria Navarro striking my Complaint answer and forcing the conspiracy issue out of my complaint answer, along with striking my countercomplaint regarding the issue of conspiracy in which I was accused of by Plaintiff, was a deliberate and intentional act to cause me irreparable harm, defame me, harass and intimidate me in favor of Plaintiff and Co-Conspirators.

Docket Entry 48 was also in part a Motion Plaintiff filed to Strike my Counter Complaint. Docket Entry 89 was also a RULING / ORDER Granting this motion to Strike my Amended Complaint.

In Document 89, COURT Order Signed by Judge Gloria Navarro Granted a Motion to Strike My Counterclaim. I, Pro Se Litigant Crystal Cox believe that Judge Gloria Navarro acted unconstitutionally and outside of the law and my rights of due process in striking my counterclaim which was related to the accusations of cyberstalking, cyber-extortion, extortion, and civil conspiracy.

Upon my knowledge and belief, Judge Gloria Navarro removed evidence of my countercomplaint because I, Pro Se Counter Plaintiff named her as a Counter Defendant and because I named large amounts of media and tech companies involved with the Plaintiff in this conspiracy against me, which I FULLY believe to be true.

Upon my knowledge and belief, Judge Gloria Navarro had no lawful or constitutional right to simply strike my complaint answer from the record and DENY me a right to amend the complaint vs striking the complaint from the record and removing it from Pacer.

Judge Gloria Navarro ordered me to file a new complaint, as a separate lawsuit, though I, Pro Se Litigant Crystal Cox fully believe that Judge Gloria Navarro did not expect me to do so, as she knew I was trying to file in Forma Pauperis and could not afford to print and mail in a new complaint nor pay the \$350 Filing Fee.

Judge Gloria Navarro IGNORED ruling on my motion to continue in Forma Pauperis in order to protect ALL counter-defendants from being served by the Marshal, which I have every right to, as a matter of law.

Judge Gloria Navarro granted a motion to strike a counter complaint in which was FILED after one of the counter defendants, Roxanne Grinage accepted service on the Complaint.

Upon my knowledge and belief, Plaintiff Marc Randazza had not bothered to answer the counterclaim filed by Pro Se Counter Plaintiff Crystal Cox on January 3rd 2013 because he knew it would be dismissed, stricken.

Plaintiff Marc Randazza, should have had a default judgement against him, however he must have known that Judge Gloria Navarro would get him out of it, as he did not answer and instead Plaintiff filed a motion to Strike Defendant / Counter Plaintiffs counterclaim.

Counter Defendant Roxanne Grinage accepted service on January 14th, 2013, and she certified that she mailed this "NOTICE OF APPEARANCE AND CERTIFICATE OF SERVICE" to the District of Nevada Courts, Judge Gloria Navarro's Court . This NEVER made it onto the Court Docket. 3 days Later on January 17th Plaintiff filed a motion to Strike Pro Se Defendant Crystal Cox's Countercomplaint.

Roxanne Grinage posted on her blog that this case was about to come to a close and that Crystal Cox had not served "us" properly so the case would soon be over. This was after she accepted service of the Complaint, and after she blogged about talking to Plaintiff Marc Randazza.

I, Pro Se Counter Plaintiff Crystal Cox even put the Roxanne Grinage acceptance of service on the docket as an exhibit, and still it was NOT acknowledged by Judge Gloria Navarro as "accepted service".

The DOCKET in this case changed often, that is why I made a copy of the Docket every time I filed a motion. There was no reason given to me as to why my descriptions of Exhibits was removed. I assume it was because the Plaintiff is an Attorney and did not want his Peers to know what the Exhibit was unless they paid to click and view, which few would do. I was not notified as to why my Exhibit descriptions were constantly changed and removed from the Docket, it was as if the Plaintiff had private meetings with Judge Gloria Navarro discussing my descriptions of Exhibits on the Docket, and they agreed privately to simply make the changes and not give me a reason why. If I made a mistake, it is Judge Gloria Navarro's duty to notify me so I can do better in the future. I was never notified. Having been Pro Se before, it was a notable difference to me, as in my Oregon Federal Court Case, when I emailed or mailed in documents, the court clerk put in a detailed description of the exhibit, so in my Nevada case, I did the same thing and my descriptions were removed.

In Document 89, COURT Order Signed by Judge Gloria Navarro said, "Rule 8 of the Federal Rules of Civil Procedure requires that a proper pleading that states a claim for relief must contain "a short and plain statement of the claim showing that the pleader is entitled to relief." "In contrast to the short and plain statement requirement of Rule 8, Defendant's Amended Counter Complaint is replete with irrelevant material, inappropriate commentary, baseless speculation, and derogatory statements none of which relate to Plaintiff's Complaint. (ECF No. 62) For this reason alone, Defendant's Amended Counter Complaint must be stricken."

Plaintiff accused me Defendant Crystal Cox of Civil Conspiracy, Conspiracy is a HUGE allegation. There is no short and plain defense to the allegation of civil conspiracy, especially when I was trying to prove to the court that the Plaintiff is the one acting in Civil Conspiracy and NOT ME, Pro Se Defendant Crystal L. Cox.

Plaintiff's complaint was filled with lies as was Plaintiff's Motion to strike my complaint answer, their motion for summary judgement and all of their motions. Plaintiff called me a criminal, defamed me, violated my rights, made inappropriate commentary, made baseless speculation, and a constant barrage of slamming and derogatory statements, and Plaintiff's motions were FILLED with irrelevant material, yet, because the Plaintiff is an Attorney, upon my knowledge and belief, Judge Gloria Navarro she takes his words as truth and accuses my words of being speculative, derogatory, irrelevant, inappropriate, baseless and unrelated.

I, Pro Se Counter Plaintiff Crystal Cox may not be a Judge, and I may not be an attorney, I may not know how to say all this perfectly, but I am telling the TRUTH and this Attorney is LYING. I am doing the best I can to do defend myself and the Public at Large from this Plaintiff. Judge Gloria Navarro has slammed me, violated my rights, defamed me, put my life in danger, issued unconstitutional rulings, blocked my right to due process and I am not a criminal, I am not the "bad guy". I am an investigative blogger, trying to expose corruption and make this world a better place. Plaintiff really did do the things I have claimed, and I really DID not do what he alleges I did.

Judge Gloria Navarro has not done an investigation, has not given me due process or even acknowledged my proof, instead, Judge Gloria Navarro has simply took the word of the Plaintiff as Fact, and his evidence of blogs of his co-conspirators as "Legal Commentary" and proof against me, when it's not fact, but simply the blog of his buddies.

Judge Gloria Navarro Says, "Defendant's Counter Complaint must also be stricken because it is an impermissible third-party complaint." however, it is not third party, it is connected to the Plaintiff, to his Attorney, to his clients, and I as trying to show that, and Judge Gloria Navarro simply strikes my counterclaims from the record.

In Document 89, COURT Order Signed by Judge Gloria Navarro, Judge Gloria Navarro Says, "Rule 14(a) of the Federal Rules of Civil Procedure limits any civil defendant's ability to assert claims against parties that were not originally named in the underlying complaint." **I was accused of civil conspiracy**, I had to show that Plaintiff is acting in conspiracy and that the reason Plaintiff brought this legal action was and is in conspiracy with all of those "related" counter defendants.

In Document 89, COURT Order Signed by Judge Gloria Navarro, Judge Gloria Navarro Says, "However, these allegations are unrelated to the underlying cybersquatting claims in Plaintiffs' original complaint. Defendant may assert the claims raised in her Counter Complaint as a separate and distinct independent Complaint by filing and initiating a new unrelated case."

The alleged counter defendants are co-conspirators and reasons that Plaintiff has accused me of cybersquatting of which I am NOT guilty of. And my allegations in my counter claim are **NOT unrelated** to the issues in the complaint, however I did file a new and separate lawsuit. However, it is IMPOSSIBLE to be fully unrelated to this case as the conspirators are connected.

As an Investigative Blogger, trying to fight corruption in the US courts, I feel it is my duty to report Judge Gloria Navarro and ask for an investigation into this matter in order to protect the public at large.

Upon my knowledge and belief, Judge Gloria Navarro striking my Complaint answer and forcing the conspiracy issue out of my complaint answer, along with striking my counter complaint regarding the issue of conspiracy in which I was accused of by Plaintiff, was a deliberate and intentional act to cause me irreparable harm, defame me, harass and intimidate me in favor of Plaintiff and Co-Conspirators.

In One Judicial ORDER, Document 89, Judge Gloria Navarro removes my complaint answer, orders me to re-file her specific way, and BLOCKS my right to a counterclaim which violates my constitutional rights and I believe violates the law.

Judge Gloria Navarro has ignored my Motion for a Protective Order. Plaintiff and co-conspirators have threatened me and my sources, I have provided Judge Gloria Navarro proof of this and though Judge Gloria Navarro grants a Protective Order to protect the Randazza Family from domain names, Judge Gloria Navarro ignores my quality of life, my safety, what Plaintiff is doing to ruin my life and business, threaten me, harass me, intimidate me, stalk me, and harass my sources / whistleblowers that give me tips and witnesses in my cases such as Monica Foster aKa Alexandria Melody and Stephanie DeYoung Oregon CPA and Bankruptcy Whistleblower, whom Marc Randazza has information on his blog that she authored years ago, it was not accurate, and she asked him to RETRACT her words from his blogs, that he got from one of the co-conspirators, he has refused. And at that time as the record shows Plaintiff Marc Randazza tried to get CPA / Whistleblower Stephanie DeYoung to conspire against Crystal L. Cox, Investigative Blogger.

Recently Plaintiff Marc Randazza, even though he has an attorney from his law firm acting as his attorney, he contacted Stephanie DeYoung to schedule a deposition in this very case. He threatened her with a subpoena and pried into my private life, all under the guise of "this case" against Crystal Cox, when he is not his own attorney in this case and has no legal right to harass witnesses.

Judge Gloria Navarro knows ALL of this and does nothing about it. I, Defendant / Pro Se Litigant / Complainant Crystal Cox even filed a Motion to Sanction Attorney Plaintiff Marc Randazza and his Attorney Ronald D. Green, in order to bring these massively important issues to the court's attention and I was IGNORED.

These Co-Conspirators have defamed me with actual malice, endangered my life, ruined my real estate career, cost me money time and hardship, and kept me in constant duress and all because I was reporting on their activities and posting tips send into me, the main goal being to remove my blogs and to silence me speaking out about Plaintiff Marc Randazza and reporting on the biggest technology theft in the world, the iViewit Technology theft. This is a Technology worth 13 Trillion Dollars and co-conspirators will stop at nothing to silence me, Investigative Blogger Crystal Cox. I feel it my duty to report these people, companies, judges, attorneys, before one of them follow through on their threats and actually kill me.

I, Defendant / Pro Se Litigant / Complainant Crystal Cox, filed a Notice of Emergency Protection from the courts regarding Co-Conspirators I had named, I gave Judge Gloria Navarro information on the dangers of these men connected to the Porn Industry and how they had threatened me and my sources, Judge Gloria Navarro completely IGNORED this emergency request for a Protection Order.

This lawsuit is about Plaintiff's' campaign of bad faith harassment against a blogger that he does not like and with whom he does not agree with. This lawsuit is about Plaintiff's' campaign of bad faith harassment against Blogger Crystal Cox, whom he once negotiated as her attorney in matters that he discusses in this legal action, Obsidian V. Cox. This lawsuit is about Plaintiff's' campaign of bad faith harassment a Las Vegas attorney seeking favoritism from a Las Vegas Judge in order to take away the constitutional rights, intellectual property and online content of a blogger that he has a personal issue with and a personal vendetta against. Plaintiff Marc Randazza has used this court, and his connections to Judge Gloria Navarro to violated the lawful and constitutional rights of Defendant Crystal Cox and Defendant Eliot Bernstein.

Professional, Seasoned Attorneys, as the Plaintiff is and his Attorney are, know that they were acting outside of the law and outside of my constitutional rights. They know I had no blog about a 4 year old and simply said I did and were believed because they are attorneys and I, Pro Se Litigant Crystal Cox have no rights in this court of Judge Gloria Navarro. I never harassed Plaintiff's daughter, he flat out lied about this to get public sympathy and to further defame and attack me, Defendant Crystal Cox.

Professional, Seasoned Attorneys, as the Plaintiff is and his Attorney are, know that all the claims they raised in this lawsuit are based on a Trademark that they do not have.

Document 75 of District of Nevada Case 2:12-cv-02040-GMN-PAL, Motion for Summary Judgement Filed by Plaintiff's Attorney Ronald D. Green Jr. of Randazza Legal Group, against Defendant Crystal Cox, filed on 2-12-2013, page 14 line 16 through 17, says, **"While Plaintiff Randazza does not possess a registered trademark in his personal name, "MARC J. RANDAZZA"**, proving Plaintiff knew all along he had no Trademark, yet committed fraud on the courts, fraud on WIPO, wasted the court's time and money, and ruined the life, quality of life and business of his intended target, Defendant Crystal Cox.

Plaintiff Marc Randazza, and his attorney Ronald Green simply make "Statement of Relevant Facts" that are flat out defamatory lies and they are protected by "this court", Judge Gloria Navarro to do so, with no factual evidence or proof of these alleged, Statement of Relevant Facts".

Judge Gloria Navarro seems to agree with Plaintiff on all of my, alleged victims, and punishes me with her RULINGS, denial of rights, Stricken Documents, and a Preliminary Injunction that completely violated ALL of my legal and constitutional rights. This court has no legal right to address all of these "alleged" victims, as this is not a material fact of this case. And as to Judge Gloria Navarro having the opinion that they are victims, this is from the stated word of the Plaintiff, and from other blogs, she called "Legal Commentary" which are friends of and connections to the Plaintiff. The alleged "victims" are simply subjects of my online reporting, whistleblowing and media and are NOT victims.

Plaintiff quotes Peter Michaelson WIPO Panelist in his Summary Judgement and other motions in order to deny my rights, yet Peter Michaelson WIPO Panelist had massive conflicts of interest and is NOT a court of law. Peter Michaelson WIPO Panelist accused Defendant Crystal Cox and Defendant Eliot Bernstein of the crime of Extortion as if he was a Judge and Jury, and with no trial, no criminal processing of any kind. Yet Judge Gloria Navarro seems to have taken this as fact, because it is WIPO and thereby instantly credible, even though it is NOT FACT, and is Defamation with actual knowledge of it being untrue.

Plaintiff Attorney Marc Randazza, and his attorney Ronald Green RECITE quotes of the WIPO decision by Peter Michaelson WIPO Panelist, to use against me in this case. And when I recite quotes from this decision and defend myself, Peter Michaelson WIPO Panelist OBJECTS and claims it irrelevant that I quote a WIPO decision in a motion.

Judge Gloria Navarro seems to agree with Plaintiff regardless of the facts, the truth and seems to allow Plaintiff to simply lie about me, defame me, bully me, and ruin my quality of life. Yet when I fight back, Judge Gloria Navarro claims that my motion should be stricken because I say "derogatory" things about the Plaintiff. When actually I am defending what Plaintiff has said about me, falsified about me, lied about me, Defendant Crystal Cox.

Judge Gloria Navarro seems to take whatever the Plaintiff says as fact and simply deny me every possible right of defense, I Object to this, and ask that Judge Gloria Navarro be investigated so that this does not happen to future victims of Randazza Legal Group.

Plaintiff Attorney Marc Randazza, and his attorney Ronald Green should not have powers over the District of Nevada, Judge Gloria Navarro, simply because they are attorneys. Nor should they have power over WIPO simply because they are connected to Peter Michaelson WIPO Panelist, this is a violation of the lawful and constitutional rights of Crystal Cox and Eliot Bernstein, the Victims of their Defamation.

Plaintiff Attorney Marc Randazza of Randazza Legal Group, and his attorney Ronald Green of Randazza Legal Group accuse Defendant Crystal Cox of Extortion throughout every motion in this legal proceeding. Plaintiff is well known in the legal community and a member of the First Amendment Bar, he is believed over Defendant Crystal Cox, even though he has no fact or proof, nor court transcript, no criminal complaint, no trial docket, nor court docket, no prosecution proof of any kind that Defendant Crystal Cox is GUILTY of the CRIME of extortion, yet Plaintiff continues to use court documents, legal filings to defame me and accuse me of the crime of extortion of which I am not guilty of nor have I had due process on. Plaintiff Attorney Marc Randazza of Randazza Legal Group has used his instant access to the court docket and his standing as an Attorney to ruin my life, defame me, lie about me and non-stop accuse me of Criminal Activity, yet for some reason is protected by this court, Judge Gloria Navarro.

Plaintiff Attorney Marc Randazza accuses me of Extorting him, yet has no proof of this and has filed no criminal complaint, WHY? Because it is not fact, yet Plaintiff Attorney Marc Randazza continues to repeat this LIE as fact in public documents and court filings, viewable by the public.

Plaintiff Attorney Marc Randazza has intimidated and threatened my sources, whistleblowers, and witnesses in my case yet publishes in court documents that Crystal Cox has engaged in Witness Tampering, when clearly I have NOT.

I have never used a domain name to harass, intimidate or extort Plaintiff, yet he uses this court as his personal MEDIA to ruin my life and my business and incite hate and harassment against me, Pro Se Defendant Crystal Cox.

Document 75 of District of Nevada Case 2:12-cv-02040-GMN-PAL, Motion for Summary Judgement Filed by Plaintiff's Attorney Ronald D. Green Jr. of Randazza Legal Group, against Defendant Crystal Cox, filed on 2-12-2013, page 14 line 16 through 17, says, **"While Plaintiff Randazza does not possess a registered trademark in his personal name, "MARC J. RANDAZZA"**

Plaintiff Marc Randazza admits to having no Trademark, yet has been able to steal massive domain names, through WIPO and through this court, and Plaintiff Marc Randazza, has deleted blogs, redirected servers, removed online competition, incited hate, published intentional lies, violated my constitutional rights, denied me due process, caused me massive duress, and wasted taxpayers money and committed fraud on this court, and all the while, KNOWING, as a Trademark Attorney himself, that he HAD NO TRADEMARK.

Plaintiff Marc Randazza, nor his allegedly attacked "family" have a Trademark, therefore Plaintiff is simply mad at what Defendant Crystal Cox said online about him, so he sued her, deleted her blogs, removed her from the search engines for massive blogs, stole domain names and redirected them to a blog post on his own blog, the Legal Satyricon, in which defames me, and this is all protected by this court, Judge Gloria Navarro.

Yet, Plaintiff files this Frivolous, Retaliatory SLAPP Lawsuit, wasting the courts time and money and ruining the life and business of Defendant Crystal Cox

Plaintiff, filed for a Default Judgement against Defendant Eliot Bernstein for \$500,000 for 5 domain names of which Plaintiff has no right whatsoever legally or constitutionally to take, and a Default Judgement for Defendant Eliot Bernstein to pay Plaintiff's Attorney Ronald D. Green, who is an attorney at Plaintiff's Law Firm Randazza Legal Group, \$23,000 in legal fees. All this and yet knowing full way as Trademark Lawyers that Marc Randazza had not Trademark.

Plaintiff claimed to WIPO that he had a Trademark and took Domain Names he had no legal right to take, and has lied to this court over and over regarding Defendant Crystal Cox. Plaintiff should not be above the law just because he is an Attorney. Plaintiff should be punished and Defendant Crystal Cox should be given relief of the deliberate defamatory actions, intellectual property theft, life endangerment and business ruining actions of Plaintiff with actual malice and deliberate intention to harm Defendant Crystal Cox and Defendant Eliot Bernstein.

Upon my knowledge and belief, Judge Gloria Navarro striking my Complaint answer and forcing the conspiracy issue out of my complaint answer, along with striking my counter complaint regarding the issue of conspiracy in which I was accused of by Plaintiff, and Granting an unconstitutional Preliminary Injunction was a deliberate and intentional act to cause me irreparable harm, defame me, harass and intimidate me in favor of Plaintiff and Co-Conspirators.

I, Defendant / Pro Se Litigant Crystal Cox, REQUEST that Judge Gloria Navarro be Removed / Reclused / Disqualified from District of Nevada **2:12-cv-02040-GMN-PAL**.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed using this Court's CM/ECF system
On February 27th 2013.

Respectfully Submitted

Crystal L. Cox

2:12-cv-02040-GMN-PAL / Pro Se Defendant

2:13-cv-00297-JCM-NJK / Pro Se Plaintiff